

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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In Re:

Linda C. Miller

Case No.: 18-29286VFP

Judge: Hon. Papalia

Chapter: 13

### CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following **(choose one)**:

1. ☒ Motion for Relief from the Automatic Stay filed by Midfirst Bank,  
creditor,

A hearing has been scheduled for April 2, 2020, at 10:00am.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

- ☐ Certification of Default filed by \_\_\_\_\_,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons **(choose one)**:

- ☐ Payments have been made in the amount of \$ \_\_\_\_\_, but have not  
been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

I spoke yesterday with the debtor who had been terminated by her previous employer and is expecting a payment of about 2K for her profit sharing right after working there about two years. She is now working at \$15 an hr. in the consumer relations dept. of Colgate Palmolive and is working remotely at least 40 hrs a week and puts in overtime also at 22.50 an hr.

☐ Other (**explain your answer**):

I have calculated that if the mortgage company is willing to roll in the \$6,600 in arrears over the remaining 19 months of my plan the debtor will be able to raise her trustee payment to the \$200 level to pay these post petition arrear while also affording her regular payment.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 3/2/2020

/s/Robert Wachtel, Attny for Debtor  
Debtor's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.